

**In the United States District Court
For the District of Maryland
(Northern District)**

Lamar A. Williams

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Plaintiff

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V.

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Case No.: ELH-18-CV-3545

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Paul M. Mayhew, et al

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Defendants

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Answer to Complaint

Defendants, Paul M. Mayhew, Suzanne T. Berger, Michael E. Field, Jennifer R. Frankovich, Kevin B. Kamenetz, Lawrence M. Stahl, James G. Beach, III, the Baltimore County Council, by undersigned council and pursuant to Federal Rule of Procedure 8, files this Answer to the Complaint:

I. Preliminary Defenses

The Complaint fails to state a claim upon which relief may be granted against any and all Defendants.

II. (All Replies Are to the Statement of Claim Attached to the Complaint)

1. Admit the allegations in Paragraph 1.
2. Admit the allegations Paragraph 2.
3. Admit the allegations in Paragraph 3.
4. Admit the allegations in Paragraph 4.
5. Deny the allegations in Paragraph 5.
6. Deny the allegations in Paragraph 6.
7. Deny the allegations in Paragraph 7.

8. Deny the allegations in Paragraph 8.
9. Deny the allegations in Paragraph 9.

III. Affirmative Defenses

- A. That all actions of the Defendants were lawful and protected actions under both federal statutes and the United States Constitution.
- B. That Plaintiff is not a qualified individual with a disability.
- C. That Plaintiff has not been retaliated against in any way.
- C. That Plaintiff has not been damaged as alleged.
- D. That Plaintiff has failed to mitigate his damages.
- E. That Plaintiff's claims are estopped, res judicata, accord and satisfaction and waiver.
- F. That Plaintiff's claims are barred by the statute of limitations.
- G. The Defendants reserve the right to raise any and all further defenses as may become apparent during the course of litigation.

Respectfully submitted,

/s/

Michael G. Raimondi
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Trial Bar No.: 05465

Certificate of Service

I hereby certify that on this February 28, 2019, a copy of the foregoing Answer to Complaint was mailed to:

Lamar A. William
P.O. Box 175
Perry Hall, MD 21128

_____/s/_____
Michael G. Raimondi